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**From:** Michael Ritorto [mritorto@rouxinc.com]  
**Sent:** 3/2/2017 10:31:52 PM  
**To:** Cirian, Mike [Cirian.Mike@epa.gov]  
**CC:** John.Stroiazzo@glencore-ca.com; Steve Wright - CFAC [swright@cfaluminum.com]; Andrew Baris [abaris@rouxinc.com]; Laura Jensen [ljensen@rouxinc.com]  
**Subject:** RE: CFAC SAP Modification #9  
**Attachments:** SAP-Record of Modification No 9.docx

Mike,

In light of our discussion yesterday and Erin's comments, we have revised SAP modification #9. We are proposing to perform the free-cyanide analysis at all sampling locations where total cyanide was detected during Round 1 and/or 2 of sampling.

Please see the attached revised document. If you agree, please sign and return. Thank you

**Michael Ritorto | Principal Hydrogeologist/Office Manager | Roux Associates, Inc.**

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**From:** Cirian, Mike [mailto:Cirian.Mike@epa.gov]  
**Sent:** Monday, February 27, 2017 6:07 PM  
**To:** Michael Ritorto <mritorto@rouxinc.com>  
**Subject:** FW: CFAC SAP Modification #9

Hello Michael,

Please take a look at Erin's (CDMs) comments in regards to Mod 9. We can discuss this Wednesday Morning.

Thanks  
Mike

Mike Cirian, PE  
Libby On-site Project Manager  
US EPA  
108 East 9th Street  
Libby, MT 59923

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**From:** Formanek, Erin  
**Sent:** Monday, February 27, 2017 10:55 AM  
**To:** Emilsson, Gunnar <[EmilssonGR@cdmsmith.com](mailto:EmilssonGR@cdmsmith.com)>  
**Subject:** RE: CFAC SAP Modification #9

Gunnar,

Typically, total cyanide is analyzed and if there are exceedances of screening values, then analysis of samples for free cyanide would be appropriate. However, I do have some criticism of the mod. It is stated that locations that have one or more exceedances of the DEQ-7 value for cyanide will have analysis of total and free cyanide in the next round of sampling. DEQ-7 is not the most conservative screening value, the EPA tapwater RSL is the lowest value. Because we have not yet been able to view the data, I am not certain if there are other locations that should be identified for free cyanide analysis when using the most conservative screening value. There is a large difference between the DEQ-7 value (200 ug/L) and the EPA tapwater RSL (0.15 ug/L). I expect there are other locations that should have this analysis performed. Why has DEQ-7 been chosen to select locations? Rationale should be provided in the mod for the selection of DEQ-7 as the screening level of choice.

Please let me know if it would be helpful to discuss this.

Thank you,  
Erin

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**From:** Emilsson, Gunnar  
**Sent:** Monday, February 27, 2017 9:31 AM  
**To:** Formanek, Erin <[formanekek@cdmsmith.com](mailto:formanekek@cdmsmith.com)>  
**Subject:** FW: CFAC SAP Modification #9

Hi Erin:

Any thoughts on free vs. total cyanide analysis. The question in the attached request seems to be one of risk.

Thanks,  
Gunnar

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**From:** Michael Ritorto [<mailto:mritorto@rouxinc.com>]  
**Sent:** Tuesday, February 21, 2017 3:50 PM  
**To:** Cirian, Mike <[Cirian.Mike@epa.gov](mailto:Cirian.Mike@epa.gov)>  
**Cc:** Hoogerheide, Roger <[Hoogerheide.Roger@epa.gov](mailto:Hoogerheide.Roger@epa.gov)>; John.Stroiazzo@glencore-ca.com; Steve Wright - CFAC <[swright@cfaluminum.com](mailto:swright@cfaluminum.com)>; lidewitt@mt.gov; cowen@mt.gov; repinedl@cdmsmith.com; Andrew Baris <[abaris@rouxinc.com](mailto:abaris@rouxinc.com)>; Laura Jensen <[ljensen@rouxinc.com](mailto:ljensen@rouxinc.com)>  
**Subject:** CFAC SAP Modification #9

Hello Mike,

Please see the attached SAP Modification #9 which describes additional sampling that CFAC/Roux is proposing to complete during the next groundwater and surface water sampling event. Please let me know if you have any questions.

Michael Ritorto

**Senior Hydrogeologist | ROUX ASSOCIATES, INC.**

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